



Control Number: 51415



Item Number: 89

Addendum StartPage: 0



**SOAH DOCKET NO. 473-21-0538
PUC DOCKET NO. 51415**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**SOUTHWESTERN ELECTRIC POWER COMPANY'S
STATEMENT UNDER SECTION 4 OF PROTECTIVE ORDER**

Certain documents provided in response to Cities Advocating Reasonable Deregulation's (CARD) First Request for Information to Southwestern Electric Power Company (SWEPCO), Question Nos. 1-2, 1-8, 1-9 and 1-10 are exempt from public disclosure pursuant to Sections 552.101 and 552.110 of the Public Information Act¹ and are subject to treatment as Confidential and/or Highly Sensitive materials.

The materials provided in response to CARD's Question Nos. 1-2, 1-8, and 1-10 contain non-public, commercially sensitive ownership, construction, and operating agreements, power sale agreement information, as well as contract terms and information that reflect certain plant-related design, specifications, and location information that constitutes confidential critical infrastructure, that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to SWEPCO.

The materials provided in response to CARD's Question No. 1-9 contain non-public commercially sensitive purchased power invoices for non-fuel or capacity charges that if released, would provide an advantage to a competitor or bidder and could cause substantial competitive harm to SWEPCO.

Counsel for SWEPCO has reviewed the documents sufficiently to state in good faith that the documents are exempt from disclosure under the Public Information Act and merit the Highly Sensitive and Confidential designations given to them.

¹ Tex. Gov. Code Ann. § 552.001-.353.

Respectfully submitted,

Melissa Gage
State Bar No. 24063949
Email: magage@aep.com
aepaustintx@aep.com (Service)

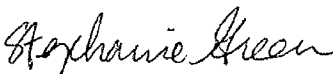
Leila Melhem
State Bar No. 24083492
Email: lmelhem@aep.com
aepaustintx@aep.com (Service)

400 West 15th Street, Suite 1520
Austin, Texas 78701
Telephone: (512) 481-3320
Facsimile: (512) 481-4591
**AMERICAN ELECTRIC POWER SERVICE
CORPORATION**

William Coe
State Bar No. 00790477
Email: wcoe@dwmrlaw.com
Kerry McGrath
State Bar No. 13652200
Email: kmcgrath@dwmrlaw.com

Patrick Pearsall
State Bar No. 24047492
Email: ppersall@dwmrlaw.com
Stephanie Green
State Bar No. 24089784
Email: sgreen@dwmrlaw.com

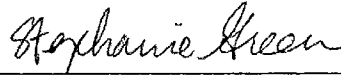
P.O. Box 1149
Austin, Texas 78767
Telephone: (512) 744-9300
Facsimile: (512) 744-9399
DUGGINS WREN MANN & ROMERO, LLP

By: 
Stephanie Green

**ATTORNEYS FOR SOUTHWESTERN
ELECTRIC POWER COMPANY**

CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on December 3, 2020, in accordance with the Second Order Suspending Rules issued in Project No. 50664 and Order No. 1 in this matter.

A handwritten signature in cursive script, reading "Stephanie Green", positioned above a horizontal line.

Stephanie Green